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CURRENT ANTITRUST POLICY IN JAPAN

Summary

Because Americans are relatively unfamiliar with Japan's anti-trust laws, they share a widespread belief that either Japan has no such laws or that enforcement of them is very lax. While antimonopoly policies are somewhat different in Japan than in the United States, this conclusion is exaggerated. An earlier Japan Economic Institute (JEI) study, written in August 1979, provided a basic introduction to the structure of Japanese antitrust law and its history of enforcement. This report extends that analysis and adds some observations on the direction of subsequent activity.

Since Japan is a country with an articulated industrial policy, it is important to look at antitrust developments in the broader context of industrial policy in Japan; to confine the discussion to antitrust case law would be to miss much that is important. For the purposes of this report, antitrust is defined as the suspicion, wariness and prohibition through law or administrative policy of business activities that might have an adverse effect on consumers.

While Japan remains a country where industry is allowed to engage in cooperative activity to a greater degree than is the case in the United States, the concept of antitrust in this broad sense has been strengthening. This report considers developments in four areas: first, the actual statutes on antitrust and their enforcement; second, the willingness of the government to legislate exemptions to the antitrust laws; third, the extent of administrative guidance as a substitute for purely private collusion; and fourth, the role of the enforcement agency in wider industrial policy discussions.

Background

Since the legal framework was covered in some detail in the earlier JEI Report, only a brief summary is provided here.¹

Postwar Occupation Origins of Antitrust Statutes — Prior to the Second World War, Japan had no antitrust laws. Monopolies during this period were rare, but zaibatsu — large, family-owned conglomerates tied in a holding-company format — controlled an increasing share of industrial activity during the 1920s and 1930s. These were dissolved during the occupation and antitrust legislation modeled on U.S. statutes was instituted.²

The Antimonopoly Act, when first enacted in 1947, prohibited monopolization, unreasonable restraint of trade (through cartels which fix prices, limit quantities or access to technology, facilities, supplies or the output market), and a variety of specific unfair methods of competition. These included refusing to receive or supply goods, charging unduly discriminatory prices, charging unduly low prices, coercing customers to deal exclusively, establishment of sole-agency contracts, and use of resale price maintenance. In addition, a variety of corporate activities that could lead to monopolization were prohibited, and remedies included corporate breakup. To enforce these prohibitions, the act established the Fair Trade Commission (abbreviated as JFTC in order to avoid confusion with the Federal Trade Commission in the United States). The JFTC is an independent commission that combines the functions of the Antitrust Division of the Department of Justice and the Federal Trade Commission.

Shortly thereafter (1949), the former Ministry of Commerce and Industry was renamed the Ministry of International Trade and Industry (MITI) and its functions were greatly strengthened. MITI was given statutory authority (until the 1960s) over allocation of foreign exchange and control over all technology licensing between Japanese and foreign firms. The agency was also the source of much of the legislation relating to various industries, which put it in a strong position to affect the course of antitrust policy.³

Post-Occupation Legal Changes — Since its passage, the Antimonopoly Act has undergone several revisions. From 1949 to 1953 a number of amendments weakened the original provisions of the law. In particular, certain types of cartels were made legal, bank limits on stockholding in non-financial companies were eased, and limited resale price maintenance was permitted. After 1953, the main thrust of change was not directed at further alteration of the Antimonopoly Act, but rather at a proliferation of special industry laws that included exemption from Antimonopoly Act prosecution for certain forms of collusive behavior. In 1965, MITI unsuccessfully proposed legislation which would have tremendously increased its power in guiding certain industries, including the administrative authority to grant exceptions to the Antimonopoly Act and to devise consensus decisions on structural changes in industry. This law, which would have considerably weakened free markets and made the JFTC virtually useless, was defeated in the Diet.⁴

The long trend toward weakening the law's original intent was finally reversed in the 1970s, with the enactment of an amendment to strengthen the law in 1977. There were a number of major changes, including a) new rules for corporate breakup, making any attempt to create a monopoly or engage in collusive activity unnecessary in certain cases of highly concentrated industries; b) a reduction in the proportion of a company's stock that could be held by a bank from 10 percent to 5 percent; c) a reporting requirement for firms in an industry where "harmonious" price increases take place within

three months of one another and d) a ten-fold increase in fines for violations (to approximately \$23,000 at current exchange rates). In addition, the JFTC could now levy a surcharge on the income of companies involved in illegal cartels based on estimated excess earnings resulting from the existence of the cartel. This was intended to offset any extra profits that illegal cartel participants earned by their participation.

JFTC Enforcement Activity

While the Antimonopoly Act provides for initiation of private suits, in practice, virtually all of the cases have been initiated by the JFTC. One reason for this has been that, unlike the United States, the law does not provide for treble damages, and an individual may not feel the results justify the effort. In any case, a look at the cases initiated by the JFTC offers a picture of the law's enforcement. A number of legal studies have considered the details of these cases and their effect on the definition of illegal activity.⁵ The purpose here is to look instead at the broad indicator of activity provided by the number of cases tried.

In analyzing the data on JFTC cases, one should be aware that once an investigation has been initiated by the JFTC and evidence submitted, the case may be formally settled in one of several ways. The JFTC may issue a recommendation finding, with which the firms involved can choose to comply voluntarily. If the recommendation is not accepted, the JFTC institutes formal proceedings, during which it acts as a court and hands down a formal decision after hearing arguments from its investigative staff and from the defendants, although defendants may agree to accept a consent decree prior to a formal decision. Formal decisions may also be appealed to the Tokyo High Court. All of these procedures are quite similar to the operation of the Federal Trade Commission in the United States.

Disposition of JFTC Cases — Table 1 summarizes JFTC enforcement activity over the postwar period. As shown, most JFTC rulings are either recommendations or consent decrees. Of a total of 751 cases, 544 accepted a recommendation finding, and 108 more were resolved with consent decrees. Only 99 went on to a formal decision, and of these 18 were appealed to the Tokyo High Court.

The tendency for cases to end at the recommendation or consent stage is entirely consistent with the general tendency in Japan to avoid confrontation in the courtroom. Most investigations, in fact, do not even proceed as far as a recommendation finding. The Fair Trade Commission was involved in 344 separate investigations in 1981 — of which 127 were ongoing cases from the previous year and 217 were initiated in 1981. Subtracting the 198 cases unresolved by the end of the year, the JFTC concluded 146 cases in 1981, of which only 13 proceeded as far as a recommendation, consent decision, or formal decision. Of the remaining investigations, 91 were stopped short of a formal recommendation through the issuance of informal "warning" notices to the firms involved. This is characteristic of the preference for informal procedures in Japan and the desire of individuals and corporations to avoid litigation. Another 44 cases were dropped because the commission found insufficient proof of wrongdoing to proceed further.

Avoidance of the more formal procedures and decisions does not necessarily mean that enforcement is lax. The compromise between adversarial parties implicit in not pressing as hard for a winner-take-all confrontation may mean that the guilty are not punished as severely or aggrieved parties not compensated as fully as they would be in the United States. On the other hand, the Japanese system brings a degree of quick, efficient action.

A more serious problem in enforcement is the lack of strong powers to obtain documentation for antitrust cases. Some cases dropped for lack of evidence might have been prosecuted if the JFTC had the legal clout that its parallel agency has in the United States. In discussing this problem, Professor John Haley⁶ notes that the JFTC's relatively active enforcement role despite this liability is due to the impact on corporations of the adverse publicity associated with being investigated; a quick agreement to cease the alleged illegal activity without admitting guilt is often preferred over what might be a more protracted struggle.

Types of Violations — The preponderance of violations handled by the JFTC have involved one or more unfair practices rather than monopoly. In fact, of the 733 cases (excluding those which went on to a Tokyo High Court decision), only six involved monopoly, and three of these were decided before the American occupation ended. The most frequent violations are restrictive trade activity involving collusive price and quantity agreements and actions against trade associations for collusive activities.

Changes in Enforcement — The number of cases decided each year, as shown in Table 1, provides a convenient look at the changing nature of Japan's antitrust enforcement. With the weakening of the Antimonopoly Act in 1953 and the concomitant proliferation of special industry legislation, the JFTC remained rather inactive. After averaging 16 decisions a year from 1947 to 1953, it dropped to an annual average of only six cases from 1954 to 1962. A major expansion in JFTC activity brought the average number of cases decided in 1963-1977 to 34 a year. The peak of JFTC activity, and probably the peak of public interest in stronger antitrust enforcement, came in 1973 and 1974 with a rash of cases resulting from a period of intense inflation accompanied by shortages of some industrial supplies and consumer necessities.

The burst of enforcement activity in the 1970s led to the modifications adopted in 1977. But oddly enough, enforcement activity since 1977 has declined, with an average of only 14 cases decided annually in the 1978 - 1981 years. It would seem that the JFTC would have become more active rather than less. No convincing explanation is available on this decline in activity, since it is hardly likely that Japanese industry was persuaded by the amendment to avoid violating the law. However, the evidence suggests that the decline in vigorous prosecution has been offset by more effective activity in other areas.

It should also be kept in mind that the 1977 amendment itself was largely unrelated to actual investigations. The new rules governing corporate breakup are irrelevant since they represent a virtually unused weapon that is no more likely to be employed in the future than in the past. The changes in bank ownership of stock do not affect JFTC enforcement until 1987 since the banks have a ten-year grace period in which to reduce their holdings. The reporting requirement on parallel price increases could have led to more cases, but was weak enough that its impact has probably been minimal. Still, the amendment did have a psychological impact in that it strengthened the importance of the JFTC as an organization.

Resale Price Maintenance — The JFTC presides over the exemptions granted for resale price maintenance. Table 2 gives the postwar history of the products and the number of companies in each industry that are involved in resale price maintenance contracts under the exemptions granted by the law. From a peak of 134 companies in 1970, the total is now down to 51; product areas have contracted from ten to two (cosmetics and pharmaceuticals). The major reductions took place between 1972 and 1974, but since 1974 there has been a modest but continuing drop in the number of companies involved under the remaining cosmetic and pharmaceutical categories.

JFTC-Authorized Cartels — A principal change — and one responsible for the argument that antitrust policy was lax in the 1950s and 1960s — was the elimination of the per se illegality of cartels. Under the 1953 revision of the act, recession cartels and rationalization cartels could be authorized by the JFTC. Recession cartels are permitted for limited periods of time (generally six months to one year, with the possibility of extensions) whenever an industry faces a decline in business or a price decline severe enough to threaten the continued operation of a majority of the firms in the industry. Rationalization cartels may also be approved by the JFTC to coordinate and protect firms in an industry that are investing in facilities needed for more efficient production. In both categories, membership in the resulting cartel is voluntary and non-participating firms cannot be legally coerced by the government to join.

Neither of these two categories of legal cartels has been heavily used, as indicated in Table 3. At its peak in 1966, 30 recession and rationalization cartels were in effect. Since then the number has declined dramatically, even though economic conditions in the 1970s placed many more industries into truly recessionary conditions than before. Since 1975, the rationalization cartel format has been largely unused (zero to one cartel a year) and the recession cartel used less frequently (one to six cartels a year).

In evaluating the drop in recession cartels, it is important to remember that some industries that would have formed recession cartels instead turned after 1978 to cartels under the new Structurally Depressed Industries Law (discussed below). The number varied from four to eight in the years from 1979 to 1981. Unlike the other forms of special industry cartels considered below, these must be approved by the JFTC.

The drop in cartels subject to JFTC approval is not necessarily due to the disinclination of the JFTC to approve them, since the initiative for the cartels must come from the industry involved (with the tacit or explicit support of the ministry overseeing the industry). However, it seems at least likely that the JFTC's attitude in reviewing cartel requests has been a factor in the decline.

In the broader context of industrial policy, some comment must be made concerning the government's willingness to legislate exemptions to the Antimonopoly Act and to preside over the collusive activity thus authorized. Two examples of changes in this regard are presented here — the number of cartels authorized under special legislation, and the current struggle over the renewal of the Structurally Depressed Industries Law.

Authorized Cartels — With the spate of special industry laws passed in the 1950s, the number of cartels that were exempt from prosecution grew swiftly, as shown in Table 3. From 53 in 1953, the number of cartels mushroomed to 1,049 in 1966 (excluding those authorized by the JFTC under the recession and rationalization provisions in the Antimonopoly Act). Since that time the number has dropped rather steadily, reaching 502 in 1982.

Since most of the laws allowing the formation of cartels are still in effect, and industries are unlikely to be any less eager to seek a legal way to collude, the decline indicates a different attitude in the ministries under whose jurisdiction the industries fall. This is true especially because industry legislation was generally worded so as to exclude the JFTC from any role in approving the cartels, leaving the decision entirely to the relevant government ministries. The laws also generally gave the ministries the power to coerce non-participants into joining the cartels.

Numbers can be deceiving, however, and the smaller number of cartels that now exist could have more members or cover a greater amount of industrial output. Data on this is sparse, but one leading Japanese antitrust scholar presents data on the "cartelization ratio," the ratio of manufacturing industry shipments covered by legal

cartel arrangements to total manufacturing industry shipments.⁷ This ratio declined from 28 percent at the end of March 1963 to 17.6 percent at the end of March 1973 — confirmation that the drop in the number of cartels has been accompanied by a decline in the relative role of cartels in the economy. The numbers, though, drop most dramatically from 1966 to 1977. In fact, from 1979 to 1982, the decline has not continued, leaving the number of authorized cartels at about 500. This suggests that recently the steam has gone out of the movement within the relevant ministries (mainly MITI) to reduce these cartels.

The Structurally Depressed Industries Law — In 1978, Japan passed a law to assist what were described as structurally depressed industries. That law provided a variety of measures, including coordinated cutbacks in production capacity, low-cost loans to facilitate the cutbacks, and legal cartels. Eventually 14 industries cut back production capacity under the law, although not all of them used the financial assistance or cartel provisions. The law is due to expire at the end of June and a replacement is now under discussion that would be aimed directly at several industries covered by the first law. MITI has drawn up legislation which would provide assistance to eight industries: aluminum smelting, petrochemicals, fertilizer, polyvinyl chloride, open-hearth and electric furnace steel, synthetic textiles, and paper and pulp. The legislation was approved by the Cabinet in February and has been submitted to the Diet. Like its predecessor, it is to run for five years, beginning July 1, 1983. Cartels formed for the purpose of reducing capacity will still be exempt from prosecution, but it is specifically stated that other joint action (allocating production, fixing prices and merging to eliminate firms, for example) will receive no exemption. On these collusion issues MITI will be allowed to consult directly with JFTC.

This plan has become very controversial. The JFTC has come out against it and called into question the effectiveness of cartels, administrative guidance and other forms of government involvement in helping structurally depressed industries. This has set the stage for a vigorous battle this spring in the Diet, although it is expected that some form of the law will be passed.

Administrative Guidance

This form of industrial policy action, which often takes the form of allowing some type of collusive activity, is a very broad category and one that is beyond the scope of this report. However, where administrative guidance authorizes an activity that violates the Antimonopoly Act, the situation has changed considerably in Japan because of the oil-cartel case brought by the JFTC.

The petroleum refining industry has had a rather close relationship with the government since the passage of the Petroleum Industry Law in 1962. Under it, MITI had a strong influence over many industry decisions, including construction of new facilities, annual production levels and prices, but the industry did not have any specific antitrust exemption. In 1972, MITI agreed to an industry-proposed production cut, subsequently implemented through the trade association. At the same time, twelve of the refiners met to work out an agreement on price increases that was then approved by MITI.

The JFTC attacked both the coordinated production cut and the price agreement, and took the unusual step of filing criminal charges at the Tokyo prosecutor's office rather than using its own administrative procedures. The case was decided by the Tokyo High Court on September 26, 1980. In the decision, the defendants were acquitted of charges stemming from the coordinated production cutback on the grounds that the industry action had been consistent with MITI's directions. The action itself was illegal, the court said, but by carrying out MITI's wishes, the companies showed no criminal intent; that is to say, they could not be held liable by one branch of the government for

doing what another branch told them to do. However, the court held that by encouraging and permitting the industry to carry out a coordinated production cut, MITI subverted the intention of the Antimonopoly Act, a statement that constituted a strong chastisement of the ministry.

On the question of price-fixing, the twelve firms involved and their executives were found guilty. In this case, the court found, the defendants received MITI's blessing after the fact, but were not following specific administrative guidance or furthering MITI policies. The argument of innocence by virtue of MITI's approval was not sufficient justification this time.

This decision was a very important one, and it struck a blow at the rather indiscriminate use of administrative guidance. Nothing in the decision struck down the use of administrative guidance to sanction otherwise illegal activity, but it certainly strengthened the JFTC's long-standing position that administrative guidance is not an acceptable excuse for illegal collusion. The decision sent shock waves through MITI, which has begun sparring with the JFTC for a definition of the acceptable limits of administrative guidance.

The JFTC's Role

The JFTC has played a role beyond simply prosecuting antitrust violations. It has moved into the debate opposing a replacement for the 1978 Structurally Depressed Industries Law and has vigorously struck out at the opportunity to draw up guidelines to limit the prerogatives of administrative guidance. Meanwhile, it has pursued an antitrust philosophy designed to encourage competition. In 1982, for example, the commission issued a report arguing that government regulation was obstructing market competition and thereby hurting the economy. The industries in which it felt regulation should be eased included banking, alcoholic beverages, airlines and other forms of transportation, warehousing, electric power and data communications.

Because the JFTC does not have Cabinet rank, it is not as powerful as the ministries responsible for economic regulation and applications of administrative guidance. It is unlikely, for instance, that it will be able to prevent the passage of the new version of the Structurally Depressed Industries Law. However, the JFTC does have some voice in these matters and can force change at the margin.

Conclusion

The concept that certain forms of corporate behavior are detrimental to the economy is well entrenched in Japan, despite its origins as an American occupation-imposed law. Although the JFTC is the sole agency charged with enforcement of the law, consideration of the policies of other ministries, particularly MITI, is essential to evaluate the course of antimonopoly policy in Japan.

While enforcement is by no means as stringent as in the United States, the JFTC has had a role to play in postwar industrial policy, as shown by the rising caseload, the 1977 amendment to strengthen the Antimonopoly Act, and its increasingly active presence in broader industrial policy discussions. Not even MITI favored outright monopolization, even during the heyday of its attempts to influence industry structure in the 1950s and 1960s. When economic growth slowed in the 1970s, MITI curbed its support for collusive activity to some extent, as represented by the enormous drop in the number of authorized cartels. MITI has not, however, abandoned its intellectual attachment to the idea of government intervention to moderate "excessive competition".

Cartels and other forms of collusive behavior in Japan are a topic of some interest now in Washington as part of the broad debate on Japanese industrial policy. Any evaluation of such policies should take into account the drop in government-authorized collusion indicated by the above analysis.

Footnotes

¹"Antitrust Policy in Japan," Council Report No. 24, August 10, 1979, Japan Economic Institute, Washington, D.C.

²Occupation reforms are covered in great detail in Eleanor Hadley, Antitrust in Japan (Princeton University Press, 1970).

³For an account of MITI's internal history and policy-making processes see Chalmers Johnson, MITI and the Japanese Economic Miracle (Stanford University Press, 1982).

⁴*ibid*, pp. 255-260.

⁵Mitsuo Matsushita, "The Antimonopoly Law of Japan" (a paper presented at the U.S.-Japan Trade Law Conference, June 6-7, 1979, sponsored by the Federal Bar Association); "Trustbusting in Japan: Cartels and Government-Business Cooperation", Harvard Law Journal, 1981, pp. 1073-1080.

⁶John Haley, "Antitrust Enforcement in Japan: Sleight-of-Hand or Reality," East Asian Executive Reports, July 15, 1980.

⁷Matsushita, "The Antimonopoly Law of Japan."

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Table 1: An Overview of Fair Trade Commission Activity, FY 1947-1981

Type of Decision	1947	1948	1949	1950	1951	1952	1953	1954	1955	1956	1957	1958	1959	1960	1961	1962	1963	1964
Recommendation	0	0	2	4	4	3	5	0	5	5	7	2	2	1	3	7	24	30
Consent	5	2	11	45	6	4	5	2	1	0	0	0	0	0	0	5	11	0
Formal Decision	0	0	1	10	8	8	2	3	5	1	0	0	0	0	0	1	1	0
Court Appeal	0	0	0	1	0	1	1	1	1	0	0	1	2	0	0	0	0	0
Total	5	2	14	60	18	16	13	6	12	6	7	3	4	1	3	13	36	30

Type of Decision	1965	1966	1967	1968	1969	1970	1971	1972	1973	1974	1975	1976	1977	1978	1979	1980	1981
Recommendation	26	17	11	28	26	43	37	27	67	47	31	24	13	7	12	12	12
Consent	0	0	0	0	1	1	0	1	1	0	2	1	1	1	1	1	0
Formal Decision	1	0	1	3	5	0	0	6	1	13	1	0	4	0	2	3	1
Court Appeal	0	0	0	0	0	0	2	1	0	1	0	1	3	1	0	0	1
Total	27	17	12	31	32	44	39	35	69	61	34	26	21	9	15	16	14

Source: JFTC, Kosei Torihiki Iinkai Nenji Hokoku (Fair Trade Commission Annual Report), 1982

Table 3: Firms with Authorized Resale Price Maintenance Contracts

Commodity/Year	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81
Cosmetics	10	24	25	24	25	25	24	25	26	32	32	36	41	44	45	46	45	47	48	51	43	34	30	27	27	27	29	28	27
Hair Dye	0	1	1	1	1	1	2	1	2	3	4	5	5	7	8	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Toothpaste	0	0	0	0	0	0	0	0	2	2	2	2	4	4	6	6	6	6	6	5	3	x	x	x	x	x	x	x	x
Household Soap	3	5	5	5	5	6	8	9	9	15	21	21	24	26	28	28	25	24	23	20	16	x	x	x	x	x	x	x	x
Household Detergent	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	2	x	x	x	x	x	x	x	x
Miscellaneous Liquor	0	0	0	0	0	0	0	0	0	0	0	0	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Caramel	0	0	0	0	1	1	1	1	1	1	1	1	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Pharmaceuticals	x	1	1	1	1	1	1	1	1	1	5	14	30	37	43	50	50	54	46	44	33	30	29	29	29	27	26	25	24
Cameras	x	0	0	0	0	0	0	0	0	0	0	0	0	2	3	3	3	3	3	x	x	x	x	x	x	x	x	x	x
Shirts	x	x	x	x	x	0	1	1	1	1	1	1	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x

Notes: 1. The numbers represent firms, most of which have multiple products covered by resale price maintenance contracts.
2. "x" means industry not authorized to engage in resale price maintenance.

Source: JFTC, Kosei Torihiki Iinkai Menji Hokoku, 1982

Table 3: Authorized Cartels in Japan, 1953-1982

(number of cartels as of March 31 of each year)

	1953	1954	1955	1956	1957	1958	1959	1960	1961	1962	1963	1964	1965	1966	1967
Antimonopoly Act, Recession Cartels	--	0	0	0	1	1	5	4	3	0	1	2	2	16	1
Antimonopoly Act, Rationalization Cartels	--	0	0	4	6	6	8	9	9	11	11	14	14	14	13
Import-Export Trade Law, 1952-	0	6	14	37	71	93	150	172	193	199	202	202	210	214	210
Designated Electronics and Textiles															
Industry Rehabilitation Law, 1971-78	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Medium-Small Industries Associations Law, 1953	53	71	143	194	218	280	314	370	467	549	591	588	587	652	634
Liquor Industry Law, 1953-	0	2	4	4	7	8	9	9	9	9	9	9	12	12	12
Sanitation Industry Law, 1957-	--	--	--	--	--	0	0	0	5	63	95	106	122	123	123
Fishery Export Industry Promotion Law, 1954-	--	--	0	8	8	11	10	11	10	11	11	11	12	11	8
Coastal Shipping Association Law, 1957-	--	--	--	--	--	1	9	10	12	13	16	15	14	16	21
Textile Industry Facilities Temporary Law, 1956-70	--	--	--	--	0	0	2	7	4	3	3	3	3	3	3
Depressed Industries Law, 1978-83	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Other	0	0	1	1	1	1	2	3	2	10	12	20	23	18	15
Total	53	79	162	248	312	401	509	595	714	868	931	970	999	1,079	1,040

	1968	1969	1970	1971	1972	1973	1974	1975	1976	1977	1978	1979	1980	1981	1982
Antimonopoly Act, Recession Cartels	0	0	0	0	9	2	0	2	1	1	6	4	1	1	3
Antimonopoly Act, Rationalization Cartels	13	12	10	13	10	10	9	0	0	0	1	0	1	1	0
Import-Export Trade Law, 1952-	216	221	218	195	177	181	138	109	98	86	75	74	70	66	62
Designated Electronics and Textiles															
Industry Rehabilitation Law, 1971-78	--	--	--	--	0	13	15	17	16	15	9	--	--	--	--
Medium-Small Industries Associations Law, 1953	582	522	469	439	606	607	591	511	395	279	290	274	267	268	290
Liquor Industry Law, 1953-	12	10	7	7	7	4	4	0	0	0	0	0	0	0	0
Sanitation Industry Law, 1957-	123	123	123	123	123	123	122	122	122	122	122	122	122	122	122
Fishery Export Industry Promotion Law, 1954-	8	8	8	8	8	7	7	8	8	8	8	8	7	7	7
Coastal Shipping Association Law, 1957	22	22	22	21	19	14	7	4	4	5	5	5	5	5	6
Textile Industry Facilities Temporary Law, 1956-70	3	3	3	--	--	--	--	--	--	--	--	--	--	--	--
Depressed Industries Law, 1978-83	--	--	--	--	--	--	--	--	--	--	--	5	8	8	4
Other	26	33	26	39	19	18	15	15	10	12	18	14	10	11	15
Total	1,003	954	886	853	976	979	908	788	634	528	534	506	491	489	505

Source: JFTC, Kosei Torihiki Iinkai Nenji Mokoku, 1982